

Renaissance One Two North Central Avenue Phoenix, Arizona 85004-2391 602.229.5200 Fax 602.229.5690 www.quarles.com Attorneys at Law in Chicago Indianapolis Madison Milwaukee Naples Phoenix Tampa Tucson Washington, D.C.

Writer's Direct Dial: 602.229.5274 E-Mail: hector.diaz@quarles.com

April 3, 2019

## BY ECF

Honorable Nicholas G. Garaufis United States District Judge United States Courthouse 225 Cadman Plaza East Brooklyn, New York 11201

RE: United States of America v. Lauren Salzman, 18 Cr. 204 (NGG)

Dear Judge Garaufis:

We are writing to you on behalf of our client, Lauren Salzman ("Ms. Salzman"), to respectfully request a temporary modification to the Court's Order Setting Release Conditions (DKT. 91; "Bail Order") to allow Ms. Salzman to travel outside of the Northern District of New York on April 6-7, 2019.

Ms. Salzman is requesting the Court's permission to travel outside of the Northern District of New York on April 6-7, 2019 so that she may visit her grandparents. Ms. Salzman's grandparents are elderly and are currently suffering with medical issues. Ms. Salzman would like to be able to visit her grandparents at their residence on these dates, so that she can spend time with them and provide them with any assistance they may need. Should the Court approve this travel, Ms. Salzman respectfully requests that the Court allow her to stay overnight at her grandparents' residence on April 6, 2019 and return home on April 7, 2019. Moreover, Ms. Salzman intends to travel by car to her grandparents' residence. The travel time from the Northern District of New York to Ms. Salzman's grandparents' residence is approximately three hours. Undersigned counsel has provided the names of Ms. Salzman's grandparents and their specific address to both the government and Pre-Trial Services.

The government and Pre-Trial Services have no objection to this temporary modification of Ms. Salzman's release conditions. If Your Honor so approves, Ms. Salzman will coordinate with her Pretrial Services Officer to arrange for her travel on April 6-7, 2019. Should the Court

Honorable Nicholas G. Garaufis April 3, 2019 Page 2

seek any additional information regarding this request, we respectfully request that the Court contact undersigned counsel. Thank you for your consideration of this request.

Very truly yours,

/s/ Hector J. Diaz Andrea Tazioli 602.229.5274 602.229.5710

HJD:dlh

CC: All Counsel (by ECF)

Pre-Trial Services Officer, Michael Dorn (by email) Pre-Trial Services Officer, Kendra Rennie (by email)

s/Nicholas G. Garaufis

Application granted